

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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KEVIN F. HUDOCK

Plaintiff

-v-

CIVIL ACTION NO. 04 CV 12117 GAO

WOODS HOLE OCEANOGRAPHIC  
INSTITUTION,

Defendant.

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**JOINT STATEMENT OF THE PARTIES  
PURSUANT TO LOCAL RULE 16.1(D)**

Pursuant to Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, the parties in the above-captioned matter submit the following Joint Statement.

- I. The parties propose that the agenda at the scheduling conference include the following proposed schedule:**
- a. Voluntary Disclosures (Rule 26(a)(1)): On or before May 18, 2005;
  - b. Deadline for Motions to Amend Pleadings: October 1, 2005;
  - c. All written discovery requests served by (including request for admissions): September 1, 2005;
  - d. Discovery Completed by (including expert and non-expert depositions, written discovery, and motions thereunder): December 31, 2005;
  - e. Rule 26(a)(2)(B) Expert Disclosure by Plaintiff: October 31, 2005
  - f. Rule 26(a)(2)(B) Expert Disclosure by Defendants: November 30, 2005

- g. Dispositive Motions Filed: February 28, 2006;
- h. Pretrial Date: On or about May 2006.

**II. Other Matters**

- a. The parties have conferred and will not consent to a trial by a magistrate judge.
- b. A written settlement proposal has been presented by Plaintiff to Defendants, and defense counsel will be prepared to respond to the proposal at the Scheduling Conference.
- c. Certifications required under Local Rule 16(D)(3) will be filed with the Court under separate cover with copies being sent to the parties.
- d. The parties anticipate that they will need to confer further with respect to the possibility of extending the time limits of depositions.

Respectfully submitted,

KEVIN HUDOCK

WOODS HOLE OCEANOGRAPHIC  
INSTITUTION.

By her Attorneys,

By its Attorneys,

/s/ William J. McLeod  
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DATED: May 9, 2005